

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

FRANCISCO PATINO, M.D.,

Defendant.

Case No. 18-20451

HON. DENISE PAGE HOOD

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**MOTION TO WITHDRAW AS COUNSEL FOR DEFENDANT**

NOW COMES, David A. Nacht and Fabiola A. Galguera, NACHTLAW, P.C., (hereinafter “Counsel”) attorneys for Defendant Francisco Patino, and hereby move this Court to permit their withdrawal as Counsel for Defendant, Francisco Patino, in the above-captioned case. This Motion is based on the following facts:

1. The Court appointed the undersigned to represent Defendant Francisco Patino, pursuant to the Criminal Justice Act.

2. There has been a breakdown in the attorney-client relationship such that the undersigned Counsel can no longer represent the interests of Defendant in this matter and good cause for withdrawal exists pursuant to MRPC 1.16.

3. Pursuant to the Criminal Justice Act, Defendant requests this Court to appoint a new attorney to represent his interests in this matter.

4. Defendant is scheduled for sentencing on January 20, 2022 at 2:00 p.m.

5. Withdrawal can be accomplished at this time without material adverse effect on the interests of Defendant as required by MRPC 1.16(b).

6. Pursuant to Local Rule 7.1, the undersigned sought concurrence of AUSA Steve Scott and Kathleen Cooperstein, for the relief sought in this motion; and AUSA Cooperstein advised the government takes no position.

WHEREFORE, David A. Nacht and Fabiola A. Galguera, of NACHTLAW, P.C., respectfully request that this Court enter an Order permitting their withdrawal as Counsel for Defendant Francisco Patino.

A copy of this motion was served upon Defendant Francisco Patino, 56739-039 by mail to 4004 East Arkona Road, Milan, Michigan 48160.

Respectfully Submitted,

NACHTLAW, P.C.

Dated: October 26, 2021

/s/ David A. Nacht  
David A. Nacht (P47034)

**PROOF OF SERVICE**

I hereby certify that on October 26, 2021, I electronically filed the foregoing pleading with the Clerk of the Court using the ECF system which will send notification of such filing to all of the attorneys of record.

/s/ Karina Alvarez  
Karina Alvarez Litigation Paralegal